

# **Exhibit 1-A**

**In The Matter Of:**  
*Cain, et al. vs.*  
*Redbox Automated Retail, LLC*

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*Michelle Cain*  
*May 27, 2014*  
*Confidential*

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1

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MICHELLE CAIN and RADHA SAMPAT,  
individually, and on behalf of  
all others similarly situated,  
Plaintiffs,

vs.

Case No. 2:12-cv-15014-GER-LJM  
Hon. Gerald E. Rosen  
Mag. Judge Laurie J. Michelson

REDBOX AUTOMATED RETAIL, LLC,  
a Delaware limited liability  
company,  
Defendant.

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CONTAINS CONFIDENTIAL PORTIONS PURSUANT TO  
PROTECTIVE ORDER

The Videotaped Deposition of MICHELLE CAIN,  
Taken at 212 East Grand River Avenue,  
Lansing, Michigan,  
Commencing at 11:27 a.m.,  
Tuesday, May 27, 2014,  
Before Rebecca L. Russo, CSR-2759, RMR, CRR.

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24

1 Q. Yeah, and I'm just trying to get at, you know, if this  
2 is sort of like a constant source of stress for you.  
3 It seems like it's not.

4 A. No.

5 Q. Right. So it's just some of the times maybe you feel  
6 stressed because of the Redbox situation?

7 A. Way back here, okay, in the back of my head, I know  
8 that this is going on non-stop. It needs to stop,  
9 okay. Everybody handles stress differently. I deal  
10 with it head-on.

11 Q. Okay. Have you ever -- do you know the name of the  
12 other plaintiff in this case?

13 A. I know the name on here, but do I know them, no.

14 Q. Okay. So you've never had any conversations with  
15 Ms. Sampat?

16 A. I can't even hardly pronounce the name.

17 Q. And, for the record, it's Radha, R-A-D-H-A, is the  
18 first name, and the last name is Sampat, S-A-M-P-A-T.

19 A. But, no, I don't know that person.

20 Q. You've never spoken with her before?

21 A. Nuh-uh, no.

22 Q. How did you get to meet Mr. Larry and his law firm?

23 A. I was working for Sam Dua at S&S Management in my  
24 office, and it was brought to my attention that there  
25 was a potential violation of privacy with Redbox.

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Confidential

25

1 Q. And what does Mr. Dua -- is it D-U-A, is the last  
2 name?

3 A. D-U-A, yes.

4 Q. What does Mr. Dua do at S&S Management?

5 A. He is an attorney for the property management company.

6 Q. And so he just mentioned this Redbox case to you, or  
7 what happened?

8 A. He mentioned it in my office, and I had said I rent  
9 from Redbox, and he asked me if I still had copies of  
10 emails, and I said yes.

11 Q. And how did it come up, the Redbox?

12 A. He just asked me if I had ever rented from Redbox,  
13 because there's a potential privacy violation going  
14 on.

15 Q. Okay. So it wasn't like it just came up in  
16 conversation. He just sort of out of the blue asked  
17 you that question?

18 A. I was in my office. He asked me that question, and I  
19 said yes.

20 Q. Okay. Did he ask anyone else that question?

21 A. There wasn't anybody else in the office but me and him  
22 and Jeremy, another associate of his.

23 Q. Oh, so he works with Mr. Dua, Jeremy?

24 A. Yes.

25 Q. Okay. Did it seem like Mr. Dua had been asking other

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26

1 people that same question?

2 MR. LARRY: Objection to the extent you  
3 know what Mr. Dua was doing.

4 BY MR. ELISEUSON:

5 Q. You can answer.

6 A. He asked me. There wasn't anybody else in the office,  
7 so I don't know if he had asked anybody else.

8 Q. Okay. Had you been talking to Mr. Dua before he asked  
9 you that?

10 A. Yeah, I talked to him every day. He was my employer.

11 Q. Okay. So you're in the middle of a conversation and  
12 he said, "Do you rent from Redbox"?

13 A. He had came in my office, I don't remember the exact  
14 time of the day, but I was an account manager in that  
15 same office, and said that there was potentially a  
16 violation of Redbox, "Do you rent from Redbox." He  
17 knows how funny I am about my personal information --

18 Q. Yeah.

19 A. -- okay, and I had told him yes. He asked me for --  
20 if I had copies of the receipts still, and I said yes,  
21 and I gave copies of the receipts to Jeremy to send to  
22 them. They referred me to Ari to see if I had a case.

23 Q. And when you say Ari, do you mean Ari Scharg?

24 A. Yes.

25 Q. Did he ask you any -- once you said that you were a

Michelle Cain - May 27, 2014  
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27

1 Redbox customer and that you had your emails, did he  
2 ask you any other questions?

3 MR. LARRY: Objection, privileged. Don't  
4 answer.

5 BY MR. ELISEUSON:

6 Q. Okay, well, let me ask -- is Mr. Dua your attorney?

7 A. No.

8 Q. Okay. So did he ask you any other questions?

9 A. No.

10 Q. And you mentioned that you actually gathered up your  
11 emails and gave them to Jeremy?

12 A. I forwarded, I do believe, two or three emails, I  
13 don't know the exact amount, to Jeremy, who then  
14 forwarded them on to Ari, because he had referred me,  
15 saying that these guys were good attorneys that could  
16 help me to see if in fact my privileges had been  
17 violated.

18 Q. Okay. So you didn't print out copies, you actually  
19 just forwarded emails to Jeremy?

20 A. Yes.

21 Q. Do you know Jeremy's last name?

22 A. I do believe it's Williams.

23 Q. And do you know -- go ahead.

24 A. Go ahead.

25 Q. I was going to say, you mentioned earlier that you've